

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Comments In the Matter Of:

Amendment of Part 97 of the)
Commission's Rules to Eliminate)
Certain One-Way Communications in)
the Amateur Radio Service Medium)
and High Frequency Bands)

RM No. 8626

To the Commission:

INTRODUCTION

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I have been continuously licensed in the Amateur Radio Service since September 17, 1956, and presently hold call sign K4KY0. I am a Life Member of both the American Radio Relay League (ARRL) and the Quarter Century Wireless Association (QCWA) with respective memberships in those two organizations for more than thirty eight (38) and thirteen (13) years. I have no commercial interests associated in any way whatsoever with the Amateur Radio Service. These comments are submitted from my perspective of having similar amateur radio experience as the petitioner, Mr. Frederic O. Maia, W5YI, and with at least as much devotion to growth in the Service and the advancement of its members.

COMMENT

The petitioner has stated through his attorney that he supports discontinuing one-way information and educational transmissions in the Amateur Service presently permitted by Section 97.111(b) primarily because he blames such for what he describes as "a growing pattern of abuse" on the amateur bands. However, rude behavior and malicious interference is nothing new to amateur radio, nor does it have anything in particular to do with one-way transmissions. It is instead a manifestation of the very same aberrant behaviors that infest most all endeavors. Simply put, if the Mr. Maia's wish is granted and bulletin stations are prohibited, the malignancy now menacing them will simply find other hosts.

Mr. Maia has implied that the on-the-air services are superfluous and are no longer needed as the information provided is available through commercial sources. He specifically named several on-line computer services, including CompuServe, Prodigy, America Online, and the Internet's World Wide Web, suggesting in the process that the "usefulness of hf bulletin stations no longer outweighs their detriments". However, he failed to mention is that these services are expensive. Subscriptions typically cost several hundred dollars per year and effectively limit access to only the economically advantaged.

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The petitioner has also suggested amateur packet networks as a viable dissemination means. Again, access is an extra cost option for those whose amateur radio stations are not already equipped with computers, appropriate software, and other specialized equipment.

Among the enumerated "methods of communicating general information to Amateurs" Mr. Maia stated would potentially replace one-way transmissions, he failed to add subscription newsletters, arguably including his own The W5YI Report. Again, this would be yet another extra cost replacement for a voluntary service now being provided at no charge.

It is additionally stated that code practice is easily accomplished via software training and simulation programs. That is quite true, but once again only if the interested parties, typically entry level amateur radio aspirants, overcome financial and technical barriers to achieve what is now offered by the ARRL and others at no cost.

CONCLUSION

Over a span of several decades, the American Radio Relay League (ARRL) and others have provided well publicized one-way bulletin and educational transmissions benefiting both the public at large and the amateur radio community. Since I first became interested in amateur radio more than forty years ago, I have known only overwhelming support for these valuable on-the-air services that have been so graciously provided to all who have access to a shortwave receiver.

Mr. Maia has failed to proffer credible evidence that the increased hostility manifesting itself on the air is the result of one-way transmissions, or that there is good reason to displace currently permitted one-way transmissions in favor of costly commercial alternatives. There is simply no justification whatsoever for effectively destroying a tried and true system that has served amateur radio and the public good for decades. I therefore find Mr. Maia's premise to be totally without merit and implore the Commission to categorically deny this petition to amend Part 97 of its Rules.

Respectfully submitted,



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May 3, 1995